



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAY 2 - 2011

Mr. Joel A. Tutein, Superintendent
Buck Island Reef National Monument
2100 Church Street, #100
Christiansted, VI 00820

Subject: EPA NEPA Review of the Buck Island Reef National Monument Draft General Management Plan/Environmental Impact Statement

Dear Mr. Tutein:

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the National Park Service (NPS) Buck Island Reef National Monument Draft General Management Plan/Environmental Impact Statement. The purpose of the General Management Plan is to "...provide management direction for the park for the next 15 to 20 years." The last comprehensive management plan was completed in 1983, and since that time there has been a boundary expansion of the park from 880 acres to 19,015 acres and the monument has been established as a "no-take" marine reserve. Additionally, elkhorn and staghorn coral have been listed as federally threatened species and the federally endangered St. Croix ground lizard has been reintroduced. Lastly, climate change, disease and storms have impacted the marine and coral ecosystem. Four alternatives for managing the Buck Island Reef National Monument are evaluated in the draft EIS.

EPA defers to NPS in technical matters pertaining to National Monument management, and supports NPSs' preferred Alternative B.

There are two areas within the document that EPA feels could be clarified and/or enhanced.

- 1) Chapter 1 includes a section entitled "Impact Topics Considered but Dismissed from Further Evaluation." One of the topics in this section is "Energy Efficiency and Conservation Potential." Within this topic, it is explained that "under any alternative, the NPS would continue to implement its policies of reducing costs, eliminating waste, and conserving resources by using energy efficient and cost-effective technology. The NPS would continue to look for energy-saving opportunities in all aspects of park operations. Because the NPS would promote energy efficiency in an equal manner under any alternative, this impact topic was dismissed from further consideration." While EPA understands this perspective, we view EISs and other NEPA documents, in part, as tools which should be used to inform the public of the ways that action agencies are working to protect the environment while carrying out their federal mission(s). Providing information regarding Energy Efficiency and Conservation for this project would help inform the public of important steps being taken by NPS for this project and

subsequently, could impact public behavior as a result of enhanced awareness and understanding of energy efficiency.

- 2) Throughout the document, there are references to picnic areas with barbeque grills which are located in the Island Discovery Zone. It is also mentioned at the end of Chapter 3 that there are no trash receptacles on Buck Island and that visitors must pack out all trash and waste upon departing the island. Given that traffic on certain parts of the island will increase, is there a plan to educate visitors about the dangers that trash can pose to the wildlife (e.g., plastic bags can wash into the ocean, scraps of food can attract wildlife and desensitize wild populations to people)? Additionally, will there be staff who are assigned the responsibility of surveying heavily trafficked areas for food waste and other trash brought onto the island by visitors?

Lastly, Chapter 1 states that "Specific details regarding the exact location, number, type of use, and placement of moorings will be provided in a separate Vessel Management Plan. The NPS is preparing a Vessel Management Plan in which the details of mooring installation, location, and purpose, as well as management issue regarding vessels, will be provided." Please provide a copy of this document to EPA upon its completion.

EPA rates this action as "LO" that is, lack of objections. EPA supports the overall National Park Service Buck Island Reef National Monument Draft General Management Plan and Environmental Impact Statement. We appreciate NPS's continued coordination with us and look forward to receipt of the Final EIS (FEIS). Should you have questions regarding these comments, feel free to contact Stephanie Lamster at (212)-637-3465.

Sincerely,



Judy Ann Mitchell, Chief
Strategic Planning and Multi-Media Programs Branch